

### United States Environmental Protection Agency Region V

Date: January 29, 1990

Subject: IPC, Rockford, Ill.—Sample Results and Possible Removal Action

From: Bernard J. Schorle Remedial Project Manager

To: Jack Barnette, Chief Response Section II

Attached is the most recent information that I have received from the Illinois Environmental Protection Agency regarding the sampling event that took place at the IPC site on November 1, 1989. Previously (around January 12, 1990) I gave L. Zintak of your section the initial results of the sampling that I had received. The results show that most of the materials sampled are hazardous wastes because of their flash points; most are below 140°F. One sample (x204) had 3.4 mg/kg of mercury and the results showed that three samples (x201, x205, and x206) contained PCBs, with a high concentration of 3100 ug/kg of Aroclor 1254; the concentration in one of these samples was below the detection limit.

After you have had a chance to look at these results and the copy of the January 23, 1990 letter from Scott Moyer of IEPA, which is also attached, I would like to talk with you or someone in your section regarding the possibility of a removal at the site. It does not appear to be desirable to leave these materials at the site until a remedial action can be carried out. There does appear to be some hope that the site operator, IPC, might undertake the removal since they conducted the recent sampling at the site.

### Attachments

cc: K. Peaceman, ORC

K.Street



Refer to: L2010300018/Winnebago County Interstate Pollution Control

(Roto Rooter)

Superfund/General Correspondence

January 23, 1990

Mr. Bernie Schorle USEPA, (5HS-11) 230 South Dearborn Chicago, Illinois 60604



RESPONSE BRANCH

RE: Immediate Removal Action at IPC based on recent sampling events.

### Dear Bernie:

At this time, I feel it important to summarize the recent sampling event that occurred on November 1, 1989 to six (6) underground storage tanks (UST) and one above ground tank at IPC in Rockford.

On November 1, 1989, IEPA and IPC had split seven samples; IPC's samples were sent to Gabriel labs in Chicago, IEPAs samples went to Weston Gulf Coast Labs in University Park, Illinois. (Gulf Coast Labs is under contract with IEPA). We received results back in early January, and one sample was reverified just recently, (see enclosure).

Sample results have shown flash points below 140 degrees fahrenheit on all samples except for x-203 and x-204. Below is a summary of the samples and their flash points.

	X-201	100	F
	X-202	105	F
	X-203	142	F
	X-204	150	F
	X-205	130	F
	X-206	110	F
aboveground	X - 207	100	F

As outlined in Subtitle G of the IEPAct, on the basis of <u>ignitable</u> characteristics, any waste material showing a flash point at or below 140 DF is considered characteristically a hazardous waste.

Through discussions with IEPA's Rockford office, they believe that some of the UST may be interconnected and therefore samples X-203 and X-204 may also be considered hazardous by the "Mixture Rule" as outlined in Subtitle G. (This information will be sought through 104e letters to PRPs)

On January 12, 1990 I had asked you to look into the possibility of USEPA implementing an immediate removal (IR) of these hazardous materials (waste oils) at IPC. As I understand, you had spoke with

your Emergency people about this site and they suggested issuing an order to IPC to remove the waste oils. What ever the procedures maybe, I believe involving USEPA in this early stage of the project will show the PRPs that the federal government is in coordination with IEPA on this State Lead Site. In essence, early USEPA involvement may provide leverage on the PRPs for them to act on this waste oil situation. Within the next couple weeks, I would like to set up a time to speak with you and your IR person(s) if USEPA wishes to be involved with this site (concerning the IR). At this time, the state is considering to going through an IR with IPC if you decide not to participate. In either case, it would be in the best interest of the PRPs and for the community, to quickly remove this waste oil due to the possibility of leaking USTs; the alternative would be to wait for a Remedial Action.

As you have recently requested, I have enclosed sample locations (within letter from IEPA, Rockford dated Nov. 9, 1989), and a recent revalidation of sample X-204 (Jan. 8, 1990).

Please call me when you want to set up a meeting in person or by phone with your IR people.

Sincerely:

Scott R. Moyer

Federal Site Project Manager Remedial Project Management Section Division of Land Pollution Control

Six P. Work

### enclosure:

cc: Terry Ayers, FSMU
Kurt Neibergall, FSMU
Jim Janssen, IRU
Paul Jagiello, (Maywood ENF)
Bob Wengrow, (Rockford FOS)
Division File



DATE:

November 9, 1989

TO:

Division File

FROM:

Kerry Keller K

SUBJECT:

2010300018 - Winnebago County

Rockford/Interstate Pollution Control (Roto Rooter)

Superfund - Technical Report

On November 1, 1989, between 1:00 p.m. and 2:30 p.m. the author was onsite to split storage tank samples with Interstate Pollution Control (IPC) representatives. Dale Jackson of IPC and Scott Schuttle of Gabriel Laboratories were conducting the sampling.

The site has seven underground storage tanks and one aboveground storage tank. Three of the underground storage tanks are beneath a truck garage and the remaining four are located immediately north of the truck garage. The aboveground tank is located east of the truck garage, (See site sketch).

According to Dale Jackson, the aboveground tank is approximately 100,000 gallon capacity and all but two of the underground storage tanks are 20,000 gallon tanks. The two underground storage tanks located along the north wall of the garage are believed to be 10,000 gallon tanks.

All of the tanks except one of the 10,000 gallon tanks contain waste oils. The western 10,000 gallon tank is believed to be filled with floor sweepings (mostly oil soaked oil dry) from the garage floor.

The following is a summary of the tank sampling information:

Sample #	Sample Time	Tank Location	Comments
X-201 X-202	1:15 p.m. 1:25 p.m.	Inside - Northeast Inside - Southeast	Underground - waste oil Underground - waste oil with Sulfur odor
X-203	1:40 p.m.	Inside - Northwest	Underground - waste oil with Sulfur odor
X-204 (No Sample) X-205 X-206 X-207	1:50 p.m. 2:05 p.m. 2:10 p.m. 2:25 p.m.	Outside - Northwest Outside - Northeast Outside - Southeast Outside - Southwest Outside - East	Underground - waste oil Underground - waste oil Underground - waste oil Underground - floor sweepings Aboveground - oil/water mixture

The samples were sent to Gulf Coast Laboratory in University Park, Illinois on November 1, 1989.

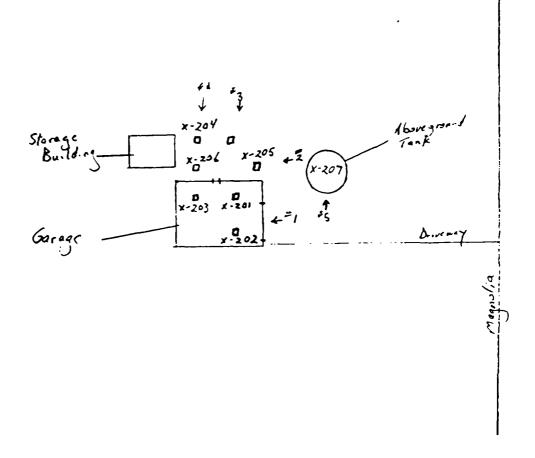
KK:t1

cc: Region 1 - File

Scott Moyer - Springfield

RESERVED NOV 1 4 1989

IED MELPO



Midt to Scale

#1-7 = # and direction of Photo

\*\* x zoi = Undergrow. d : torage tank

location and sample #

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〇 N TIME: \_\_\_\_\_\_\_A.M.(P.M.)

PHOTO BY: \_\_\_\_\_\_Kerry weller

SITE #: \_\_\_\_\_2010300018

COUNTY: \_\_\_\_\_\_Winnebago

FACILITY: \_\_\_\_\_\_Rockford/Interstate
 \_\_\_\_\_\_Pollution Control

COMMENTS: \_\_\_\_\_\_\_Looking W: \_\_\_\_\_\_\_\_Inside garage with three \_\_\_\_\_\_\_\_\_underground storage tanks.

PHOTO #: 1 ROLL #: 347



NOV 1 4 1989

75 - 7<sub>2</sub>76

DATE: November 1, 1989

TIME: D:48 A.M.AP.M.

THOTO BY: Ferry Keller\*

SITE #: D:0000018

COUNTY: Minimate Interstate

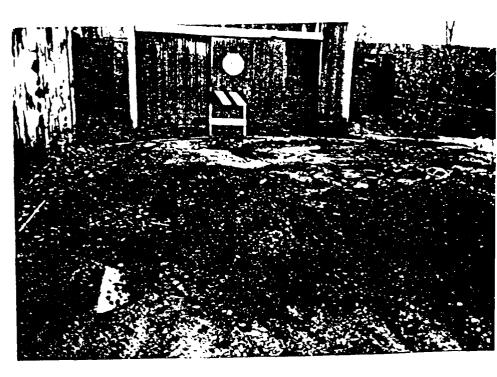
FACILITY: Provious Interstate

Follution Control

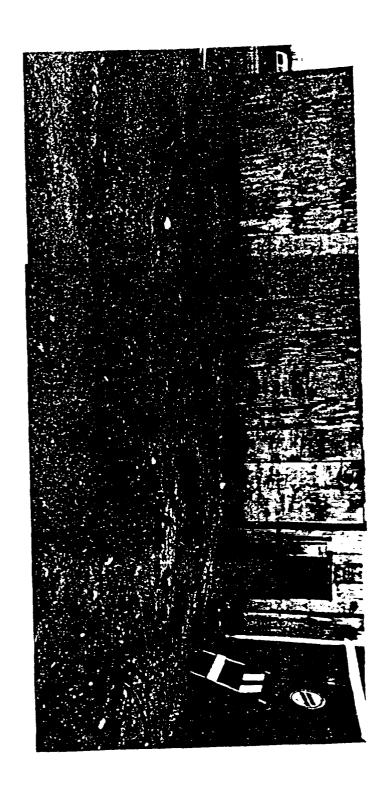
COMMENTS: Locking K:
Location of four underground

storage tanks north of garage.

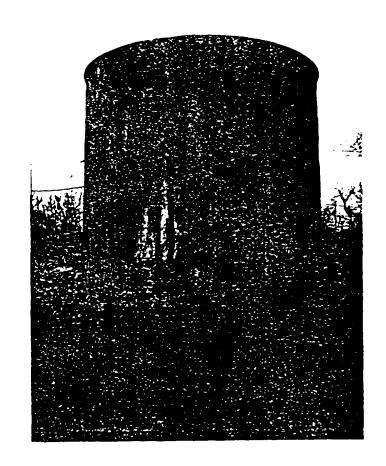
PHOTO #: . ROLL #: 347



DATE:
TIME: 2:46 2.M. (F.M.)
PHOTO BY: kenny harrier
SITE #: 2010300016
COUNTY: Winnebago
FACILITY: Rockford/Interstate
Pollution Control
COMMENTS: Looking S:
Location of four underground
storage tanks north of garage.
PHOTO #: 3 ROLL =: 347
DATE: November 1, 1989
TIME: 2:46 A.M. (P.M.)
PHOTO BY: Kerry Keller
SITE #: 2010300018
COUNTY: Winnesses
FACILITY: Rocafiled Intenstate
Poliution Control
COMMENTS: Looking S:
Location of four underground
storage tanks north of garage.
223772 20 10 0 0 00 000



PATE: 1
TIME:
PHOTO BY: THEFT, A THEFT
SITE #:
COUNTY: kinnebago
FACILITY: Paciford/Interstate
Pollution Control
COMMENTS: Looking N:
100,000 galion above ground
storage tank.
PHOTO #: 5 ROLL #: 347
DATE:
TIME:
PHCTO BY:
UITE #:
CCUNTY:
FACILITY:
COMMENTS:
311570 4



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WESTON-GULF COAST LABORATORIES, INC.

2417 Bond St., University Park, Illinois 60466

Phones: (312) 534-5200 (219) 885-7077 (815) 723-7533

20103000 18 Willelyo Interstate Bollution Control

January 8, 1990

Mr. Ron Turpin Division of Laboratories #4 Illinois Environmental Protection Agency P.O. Box 19276 2200 Churchill Road Springfield, IL 62794-9576

Dear Mr. Turpin:

Please find enclosed the corrections you requested for the samples submitted to Weston/Gulf Coast Laboratories for analyses. They were identified as follows:

Facility Name:

Interstate Pollution Control

Site Inventory #: 2010300018 Site Billing Code: LP-52573 Project Manager:

Scott Hoyer RFW Laboratory Batch #: 89116770

If you have any questions, please contact Sheryl Johnson or Lynn Gifford at our laboratories.

Sincerely,

WESTON/GULF COAST LABORATORIES

Charles R. Maw Project Manager

Sj

Enclosures

RECEIVED

JAN 1 1 1990

ICTAULES



WESTON-GULF COAST LABORATORIES, INC. 2417 Bond St., University Park, Illinois 60466 Phones: (708) 534-5200 (219) 885-7077 (815) 723-7533

ANALYTICAL REPORT

To: Illinois EPA

2200 Churchill Road

P.O. Box 19276

Springfield, IL 62794-9276

Attn: Mr. Ron Turpin

Date: Monday January 8th, 1990

RE: Int Pol Control X204

Project # 1104-09-01-0000 Lab ID: 8911G770-004

Sample Date: 11/01/89 Date Received: 11/02/89

# Inorganic Client Data Report

	Parameters	Result	Units	Reporting Limit
	Cyanide, Total	0.52	mg/kg	0.47
	Flash Point	150	DEG F	
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To: Illinois EPA

2200 Churchill Road

P.O. Box 19276

Springfield, IL 62794-9276

Attn: Mr. Ron Turpin

Date: Monday January 8th, 1990

RE: Int Pol Control X204

Project # 1104-09-01-0000 Lab ID: 8911G770-004 Sample Date: 11/01/89 Date Received: 11/02/89

Units: UG/KG

## VOLATILES BY GC/MS, HSL LIST

Volatile Compound	Result	Detection Limit	Flag
Chloromethane	BDL	50000	U
Bromomethane	BDL	50000	U
Vinyl Chloride	BDL	50000	U
Chloroethane	BDL	50000	Ü
Methylene Chloride	35000	25000	В
Acetone	48000	50000	JB
Carbon Disulfide	BOL	25000	U
1,1-Dichloroethene	BDL	25000	U
1,1-Dichloroethane	270000	25000	
1,2-Dichloroethene (total)	250000	25000	
Ćhloroform	BDL	25000	U
1,2-Dichloroethane	BDL	25000	U
2-Butanone	BDL	50000	U
1,1,1-Trichloroethane	110000	25000	
Carbon Tetrachloride	BDL	25000	U
Vinyl Acetate	BDL	50000	U
Bromodichloromethane	BDL	25000	υ;



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### ANALYTICAL REPORT

To: Illinois EPA
2200 Churchill Road
P.O. Box 19276

Springfield, IL 62794-9276

Attn: Mr. Ron Turpin

Date: Monday January 8th, 1990

Units: UG/KG

RE: Int Pol Control X204
Project # 1104-09-01-0000
Lab ID: 89116770-004
Sample Date: 11/01/89
Date Received: 11/02/89

## VOLATILES BY GC/MS, HSL LIST

Volatile Compound	Result	Detection Limit	Flag
I,2-Dichloropropane	BDL	25000	U
cis-1,3-Dichloropropene	BDL	25000	U
Trichloroethene	110000	25000	
Dibromochloromethane	BDL	25000	Ü
1,1,2-Trichloroethane	BDL	25000	U
Benzene	31000	25000	
Trans-1,3-Dichloropropene	BDL	25000	U
Bromoform	BDL	25000	U
4-Methyl-2-pentanone	BDL	50000	U
2-Hexanone	BDL	50000	U
Tetrachloroethene	40000	25000	
1,1,2,2-Tetrachloroethane	BDL	25000	U
Toluene	220000	25000	
Chlorobenzene	BDL	25000	U
Ethylbenzene	380000	25000	
Styrene	BDL	25000	U
Xylene (total)	840000	25000	3



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Attn: Mr. Ron Turpin

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RE: Int Pol Control X204
Project # 1104-09-01-0000
Lab ID: 8911G770-004
Sample Date: 11/01/89
Date Received: 11/02/89

Units: UG/KG

iter than 10% of the n	earest
itatively identified b	y mass
This is exclusive of	any target
niernal standards.	
Retention	Estimated
Time	Concentration
23.11	80000
25.88	200000
26.44	60000
26.66	60000
27.28	100000
27.56	200000
28.53	200000
	Retention  Time  23.11  25.88  26.44  26.66  27.28  27.56